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Attorneys for Defendants STATE OF HAWAII and NEIL ABERCROMBIE, in his official capacity as Hawaii Governor

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

CHRISTOPHER BAKER,

Plaintiff,

VS.

LOUIS KEALOHA, as an individual and in his official capacity as Honolulu Chief of Police; STATE OF HAWAII; CITY AND COUNTY OF HONOLULU; HONOLULU POLICE DEPARTMENT; NEIL ABERCROMBIE, in his official capacity as Hawaii Governor,

Defendants.

CIVIL NO. 11-00528 ACK-KSC

DEFENDANTS STATE OF HAWAII AND NEIL ABERCROMBIE'S, in his official capacity as Hawaii Governor, **INITIAL DISCLOSURES;** CERTIFICATE OF SERVICE

DEFENDANTS STATE OF HAWAII AND NEIL ABERCROMBIE'S, in his official capacity as Hawaii Governor, INITIAL DISCLOSURES

Defendants State of Hawaii and Neil Abercrombie, in his official capacity as Hawaii Governor ("Defendants"), by and through their attorneys, David M. Louie, Attorney General of Hawaii, and Caron M. Inagaki and Kendall J. Moser, Deputy Attorneys General, hereby submit their initial disclosures.

I. INDIVIDUALS WITH NON-PRIVILEGED PERSONAL KNOWLEDGE

At this time, Defendants are unaware of any individuals connected with the State of Hawaii who have personal knowledge of the events giving rise to Plaintiff's claims.

II. <u>DOCUMENTS</u>

At this time, Defendants are unaware of any documents relevant to Plaintiffs' claims in their possession, custody, or control.

III. DAMAGES

At this time, Defendants are not claiming any damages other than the costs of suit.

IV. <u>INSURANCE COVERAGE</u>

The State of Hawaii is self-insured to \$2,000,000.00 and has excess coverage above that amount.

DATED: Honolulu, Hawaii, November 18, 2011.

STATE OF HAWAII

DAVID M. LOUIE Attorney General State of Hawaii

KENDALL J. MOSER
Deputy Attorney General

Attorney for Defendants STATE OF HAWAII and NEIL ABERCROMBIE, in his official capacity as Hawaii Governor